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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JOYCE SIRIANNI,

11 Plaintiff,

12 vs.

13
14 ALLIED WORLD INSURANCE
COMPANY, a New York company;
15 DEMETRIOS A. DALACAS, ESQ.,
16 individually; DEMETRIOS A.
DALACAS, ESQ., P.C., a Nevada
17 professional corporation; DOES I-X and
ROE CORPORATIONS I-X, inclusive,
18

19 Defendants.
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CASE NO.: 2:20-cv-00118-KJD-EJY

**STIPULATION AND [PROPOSED
ORDER] FOR EXTENSION OF TIME
TO FILE RESPONSE TO OPPOSITION
TO PLAINTIFF'S MOTION TO
REMAND**

(First Request)

21 IT IS HEREBY STIPULATED AND AGREED, by and between
22 Plaintiff/Counterdefendant JOYCE SIRIANNI, through her counsel of record, Dennis
23 M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and
24 Defendant/Counterclaimant ALLIED WORLD INSURANCE COMPANY, through its
25 counsel of record, Chad C. Butterfield of WILSON, ELSER, MOSKOWITZ, EDELMAN
26 & DICKER LLP, that the deadline for Plaintiff to file her Response to Defendant
27 ALLIED WORLD INSURANCE COMPANY's Opposition to Plaintiff's Motion to
28



1 Remand (ECF No. 17) shall be extended by seven (7) days, from March 27, 2020 to April
2 3, 2020. The Motion was filed on February 14, 2020. This proposed Stipulation and
3 Order is submitted in accordance with LR IA 6-1

4 Plaintiff respectfully requests this brief extension of time to file her response. The
5 ongoing concerns related to the COVID-19 pandemic and restrictions imposed on social
6 gathering have impacted the operations of the undersigned counsel's office. Specifically,
7 there were some unforeseen delays that resulted while Plaintiff's counsel secured remote
8 access for staff members to simultaneously work from home. Accordingly, the parties
9 respectfully request this Court to approve the foregoing stipulation as their requested
10 extension is not made in bad faith or to unnecessarily delay these proceedings.

11 DATED this 27th day of March, 2020.

DATED this 27th day of March, 2020

12 **PRINCE LAW GROUP**

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

13
14 /s/ Dennis M. Prince
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/s/ Chad C. Butterfield
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Attorneys for Defendant
Allied World Insurance Company

19 **ORDER**

20 **IT IS SO ORDERED.**

21 DATED this 2nd day of April, 2020.

22 

23 UNITED STATES DISTRICT JUDGE